

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**Re Docket No. 141**

**CERTIFICATION OF COUNSEL REGARDING APPLICATION  
TO EMPLOY ANKURA CONSULTING GROUP, LLC AS CHIEF  
RESTRUCTURING OFFICER (II) DESIGNATING PHILIP J. GUND AS  
CHIEF RESTRUCTURING OFFICER FOR THE DEBTORS EFFECTIVE  
AS OF THE PETITION DATE, AND (III) GRANTING RELATED RELIEF**

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The undersigned hereby certifies that:

1. On August 24, 2023, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Application to Employ Ankura Consulting Group, LLC as Chief Restructuring Officer (II) Designating Philip J. Gund as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief* [Docket No. 141] (the “Motion”).

2. Pursuant to the *Notice of Hearing on Application to Employ Ankura Consulting Group, LLC as Chief Restructuring Officer (II) Designating Philip J. Gund as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief* [Docket No. 141-2], objections to entry of a final order granting the Motion were due no later than September 7, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

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<sup>1</sup> A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc. principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

3. The Debtors received informal responses from the Official Committee of Unsecured Creditors (the “Committee”) and the Office of the United States Trustee (the “UST”). No party filed an answer, objection, or other responsive pleading to the Motion on the Court’s docket.

4. Attached hereto as **Exhibit A** is a revised proposed form of order approving the Motion which incorporates the comments of the Committee and the UST (the “Proposed Order”).

5. A blacklined copy of the Proposed Order is attached hereto as **Exhibit B**, showing changes from the Final Order submitted with the Motion.

6. Accordingly, the Debtors request that the Proposed Order attached hereto as **Exhibit A** be entered at the Court’s earliest convenience.

Dated: September 13, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ James E. O’Neill*

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